

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90

**COMMENTS OF  
WEST CAROLINA RURAL TELEPHONE COOPERATIVE, INC.**

West Carolina Rural Telephone Cooperative, Inc. (“WCRTC”) welcomes this opportunity to provide input to the Federal Communications Commission (“FCC”) regarding the National Broadband Map and the Connect America Fund (“CAF”). WCRTC respectfully submits these comments to assist the FCC with updating and correcting the data used to produce the National Broadband Map and determine unserved and partially unserved areas to target for potential future rounds of CAF Phase I funding. The FCC “seeks comment on areas where coverage is either overstated (*i.e.*, by omission of unserved census blocks from the list) or understated (*i.e.*, census blocks are listed as unserved when they are in fact served).”<sup>1</sup> WCRTC has identified several census blocks on the FCC’s list and map provided in the December 5, 2012 Public Notice (DA 12-1961) where the company believes various inaccuracies exist. As explained in detail below, WCRTC has identified census blocks that are misidentified as price cap territory and incorrectly labeled as partially unserved. WCRTC requests that the FCC consider these inaccuracies and incorporate the corrections and the information provided herein in an updated map to utilize for the final rules for distributing the remaining \$185 million in CAF Phase I.

WCRTC is a rural incumbent local exchange carrier serving Abbeville, McCormick, and Anderson Counties in South Carolina. WCRTC also has a subsidiary competitive local exchange carrier, West Carolina Communications, LLC (“WCC”). WCRTC provides fiber-to-the-home

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<sup>1</sup> See Wireline Competition Bureau Seeks Comment on Areas Shown as Unserved on the National Broadband Map for Connect America Phase I Incremental Support, WC Docket No. 10-90, Public Notice, DA 12-1961 (rel. December 5, 2012) (“December 5 Public Notice”).

(“FTTH”) throughout its service area, and WCC provides DSL service. Both WCRTC and WCC provide broadband at speeds up to 30 Mbps download, 3 Mbps upload.

### **Census Blocks with Inaccuracies in West Carolina Tel’s Service Area**

WCRTC has carefully reviewed the data and map released with the December 5 Public Notice, and has identified six census blocks within its service area with inaccuracies. The FCC requests in the Public Notice that commenters “provide specific, actionable information rather than general statements.”<sup>2</sup> WCRTC believes that the following information is specific and actionable, and will greatly aid the FCC in its efforts to improve the data used for determining potential future rounds of CAF Phase I support for price cap carriers. The attached map (Attachment 3) illustrates precisely where the inaccuracies were found.

1. Census block no. **450019505002032** in Abbeville County spans both CenturyLink and WCRTC service territories. The FCC’s data lists this census block as a price cap territory where broadband is partially unavailable. The portion of this census block covered by WCRTC is served with broadband at speeds up to 30 Mbps down, 3 Mbps up.
2. Census block no. **450659201001002** in McCormick County is incorrectly listed as a price cap territory. This census block is entirely in WCRTC’s service area. Furthermore, the FCC’s data incorrectly states that broadband is partially unavailable in this census block. WCRTC serves the entire census block with broadband at speeds up to 30 Mbps down, 3 Mbps up.
3. Census block no. **450659202001047** in McCormick County is incorrectly listed as a price cap territory. This census block is entirely in WCRTC’s service area. Furthermore, the FCC’s data incorrectly states that broadband is partially unavailable in this census block. WCRTC serves the entire census block with broadband at speeds up to 30 Mbps down, 3 Mbps up.
4. Census block no. **450659202005040** in McCormick County is incorrectly listed as a price cap territory. This census block is entirely in WCRTC’s service area.

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<sup>2</sup> See December 5 Public Notice

Furthermore, the FCC's data incorrectly states that broadband is partially unavailable in this census block. WCRTC serves the entire census block with broadband at speeds up to 30 Mbps down, 3 Mbps up.

5. Census block no. **450659202005053** in McCormick County is incorrectly listed as a price cap territory. This census block is entirely in WCRTC's service area.

Furthermore, the FCC's data incorrectly states that broadband is partially unavailable in this census block. WCRTC serves the entire census block with broadband at speeds up to 30 Mbps down, 3 Mbps up.

6. Census block no. **450659202005013** in McCormick County is incorrectly listed as a price cap territory. WCRTC serves most of this census block, and the company's CLEC WCC serves the remaining portion. The FCC's data incorrectly states that broadband is partially unavailable in this census block. WCRTC or WCC serve the entire census block with broadband at speeds up to 30 Mbps down, 3 Mbps up.

The December 5 Public Notice further asks if any of the census blocks include areas served through the Broadband Investment Program ("BIP") or the Broadband Technologies Opportunities Program ("BTOP"). WCRTC notes that none of the above-mentioned census blocks are in areas that received BIP or BTOP funds, but WCRTC has received RUS loans which contribute to the improvement and delivery of broadband throughout its entire ILEC service area.

Additionally, the FCC asks if commenters have notified their relevant state mapping entity or any other entity of the inaccuracies, and what the outcome of the discussion was. WCRTC has not notified its state mapping entity, Connect South Carolina, of the above-mentioned inaccuracies in the National Broadband Map. However, WCRTC notes that it has observed disconnects between the state and national maps, with the state map more accurately depicting WCRTC and WCC's service area than the National Broadband Map. The attached Connect South Carolina maps (Attachments 1 and 2) show correctly that nearly all of Abbeville and McCormick Counties are served by fiber broadband, and there are no unserved or underserved areas. The National Broadband Map, however, incorrectly identifies several underserved areas (as explained above). WCRTC requests that the FCC consider these discrepancies as it undergoes the process of updating and correcting the National Broadband Map.

WCRTC requests that the FCC consider the mapping and data inaccuracies described herein prior to awarding future rounds of CAF Phase I. WCRTC believes that if these corrections are made, the FCC will be able to more accurately target CAF Phase I funding to unserved areas with the greatest need for broadband.

Respectfully submitted,

West Carolina Rural Telephone Cooperative

A handwritten signature in black ink, appearing to read 'Shannon Butler', is written over a horizontal line.

By: Shannon Butler

External Affairs/Government Relations Manager

January 9, 2013

Attachments

**WEST CAROLINA RURAL TELEPHONE COOPERATIVE, INC.**

**ATTACHMENTS**

## **Attachment 1**

### **Connect South Carolina Underserved Broadband Service Inventory for the State of South Carolina by Terrestrial, Non-Mobile Broadband Service**

This map shows Abbeville and McCormick Counties are entirely served by broadband service of at least 3 Mbps download, 786 kbps upload.

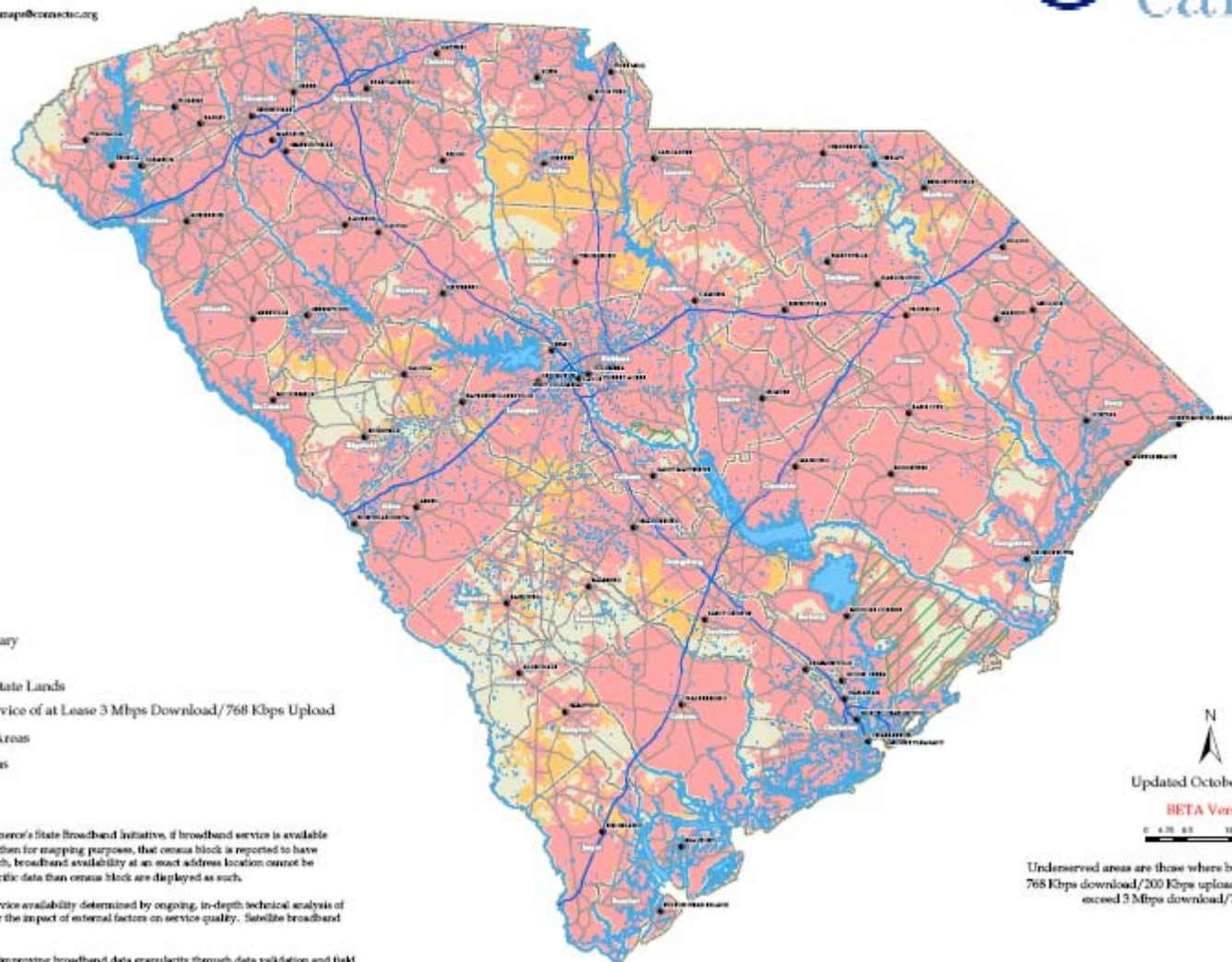
# Underserved Broadband Service Inventory for the State of South Carolina by Terrestrial, Non-Mobile Broadband Service

Submit questions or recommended changes to [maps@connectsc.org](mailto:maps@connectsc.org)



## Symbology

- City
- Interstate
- US Road
- County Boundary
- Water
- National and State Lands
- Broadband Service of at Least 3 Mbps Download/768 Kbps Upload
- Underserved Areas
- Unserved Areas



Updated October 1, 2012

BETA Version

Underserved areas are those where broadband speeds of at least 768 Kbps download/200 Kbps upload are advertised, but do not exceed 3 Mbps download/768 Kbps upload.

As required by the US Department of Commerce's State Broadband Initiative, if broadband service is available to at least one household in a census block, then for mapping purposes, that census block is reported to have some level of broadband availability. As such, broadband availability at an exact address location cannot be guaranteed. Providers supplying more specific data than census block are displayed as such.

This map represents areas of broadband service availability determined by ongoing, in-depth technical analysis of provider networks and accommodations for the impact of external factors on service quality. Satellite broadband services may also be available.

Map users are encouraged to participate in improving broadband data granularity through data validation and field testing efforts. Learn more about this and other broadband mapping facts at [www.connectsc.org](http://www.connectsc.org).

## **Attachment 2**

### **Connect South Carolina Broadband Service Inventory for the State of South Carolina**

This map shows fiber broadband is available in nearly all of Abbeville and McCormick Counties, including all of WCRTC and WCC's service area; however the CLEC service area is actually served by DSL at the same speeds as the ILEC service area (30/3 Mbps).



# Broadband Service Inventory for the State of South Carolina

Advertised Speeds of at Least 768 Kbps Downstream  
and 200 Kbps Upstream

Submit questions or recommended changes to: [maps@connectsc.org](mailto:maps@connectsc.org)

## Symbology

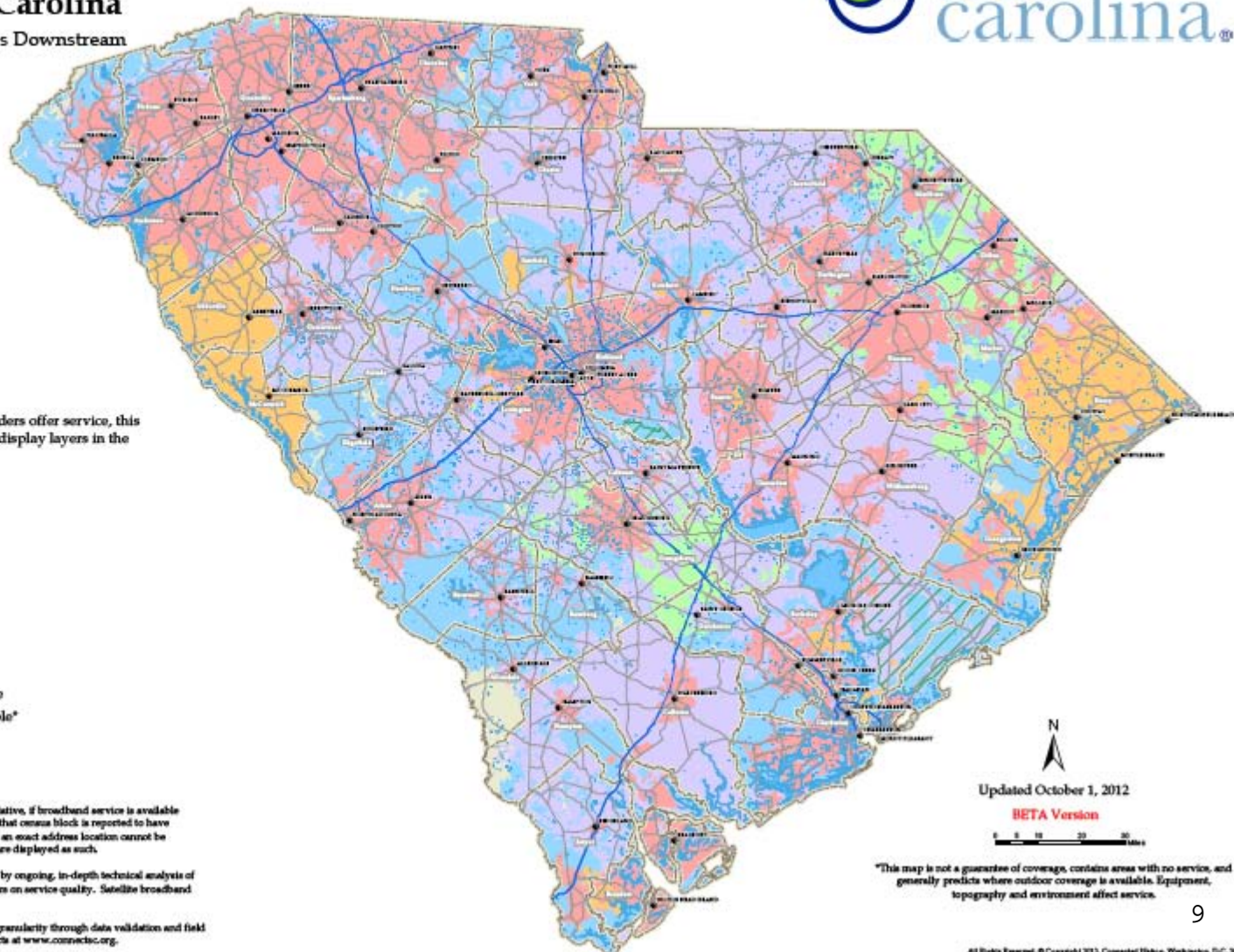
In areas where multiple broadband providers offer service, this platform composite map stacks coverage display layers in the order presented below.

- City
- Interstate
- US Road
- County Boundary
- Water
- National and State Lands
- Fiber Broadband Available
- Cable Broadband Available
- DSL Broadband Available
- Fixed Wireless Broadband Available
- Mobile Wireless Broadband Available\*
- Unserviced Areas

As required by the US Department of Commerce's State Broadband Initiative, if broadband service is available to at least one household in a census block, then for mapping purposes, that census block is reported to have some level of broadband availability. As such, broadband availability at an exact address location cannot be guaranteed. Providers supplying more specific data than census block are displayed as such.

This map represents areas of broadband service availability determined by ongoing, in-depth technical analysis of provider networks and accommodations for the impact of external factors on service quality. Satellite broadband service may also be available.

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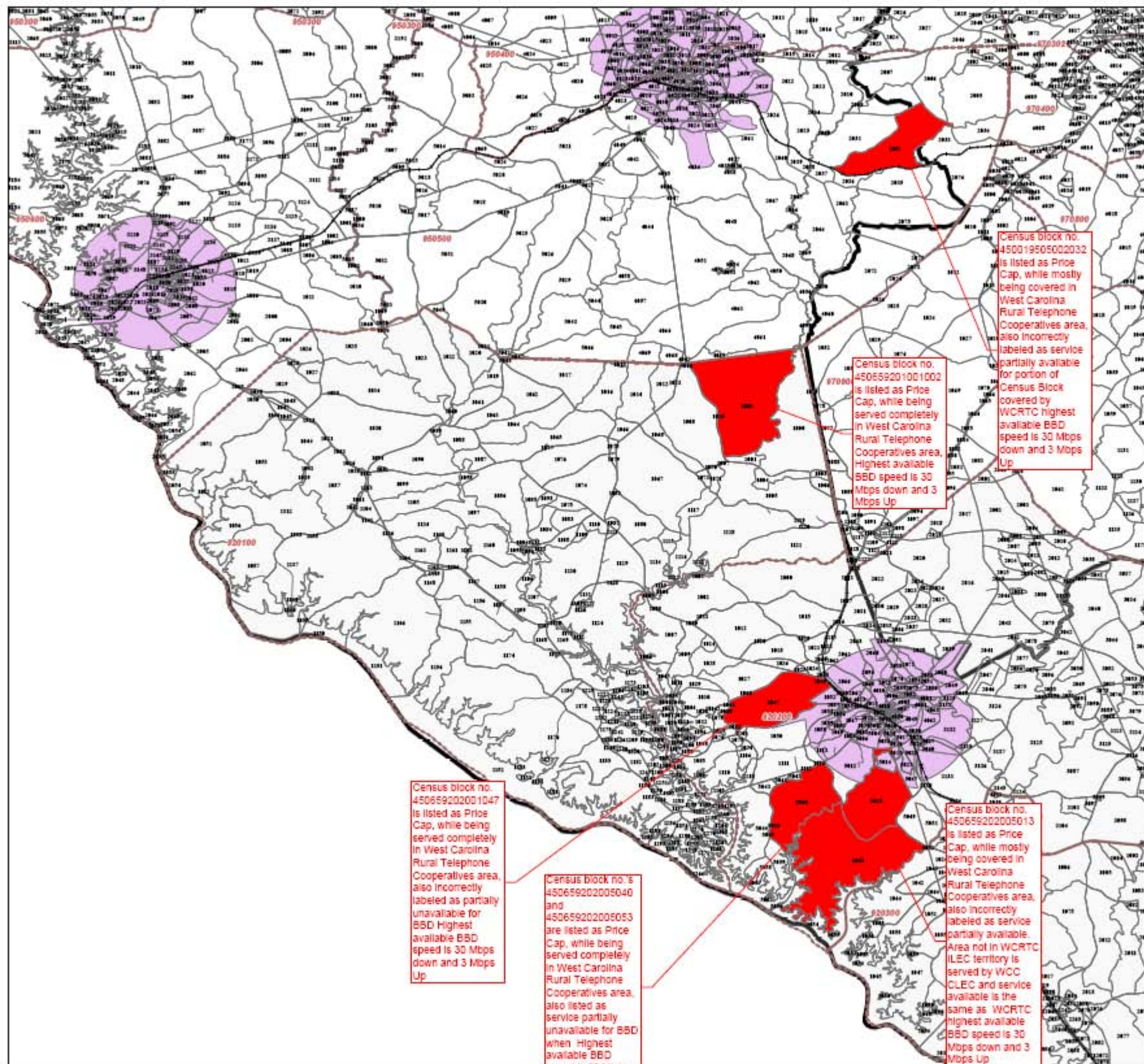
\*This map is not a guarantee of coverage, contains areas with no service, and generally predicts where outdoor coverage is available. Equipment, topography and environment affect service.

### **Attachment 3**

#### **Census Blocks in Abbeville and McCormick Counties Incorrectly Identified on the National Broadband Map**

This map illustrates the census blocks where WCRTC identified errors in the National Broadband Map, as explained in these comments.





#### Legend

RAILROAD

<all other values>

COUNTYFP10, BLOCKCE10, TRACTCE10

001, 2032, 950500

065, 1002, 920100

065, 1047, 920200

065, 5013, 920200

065, 5040, 920200

065, 5053, 920200

Census Tract

sde.SDE.CLEC\_Boundaries

#### COUNTYS

NAME

ABBEVILLE

ANDERSON

EDGEFIELD

GREENWOOD

LAURENS

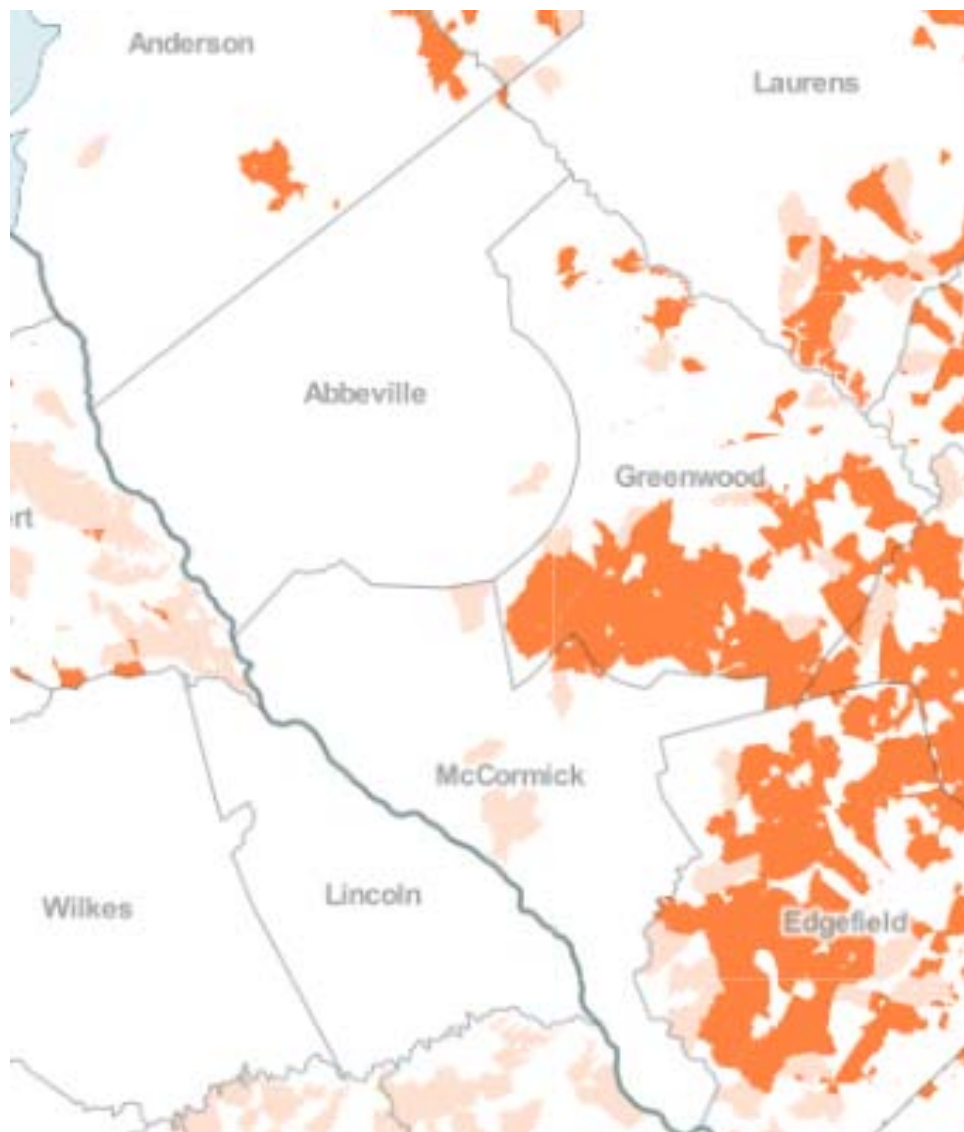
McCORMICK

WCTEL Service Area

## **Attachment 4**

### **FCC Unserved Fixed Broadband Map**

This map is based on the December 2011 National Broadband Map and was released with the FCC's December 5 Public Notice. Abbeville and McCormick Counties have several census blocks that are incorrectly shown as partially unserved, contrary to the Connect South Carolina maps and WCRTC's knowledge of its service territory.





## CERTIFICATE OF SERVICE

I hereby certify that the foregoing comments on updates and corrections to the National Broadband Map in response to the Federal Communications Commission's December 5, 2012 Public Notice (DA 12-1961) were served this 9<sup>th</sup> day of January, 2013, by mailing true and correct copies thereof, postage prepaid, to the following persons:

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